

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Ronald I. LeVine
210 Rivert Street Ste. 11
Hackensack, NJ 07601
201 489-7900

In Re:

HENRY CASANOVA

Case No.: 18-22020SLM

Judge: Meisel

Chapter: 13

Counsel's

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following **(choose one)**:

1. ☒ Motion for Relief from the Automatic Stay filed by Trinity Financial Services, LLC, creditor,

A hearing has been scheduled for July 10, 2019, at 10:00.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☐ Certification of Default filed by _____.

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons **(choose one)**:

☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

As debtor's counsel I have communicated with Laura Leach in house counsel for Trinity to revive a proposed loan modification agreement that was not accepted by debtor. Ms. Leach has not yet responded. I also reached out today with Denise Carlon who agreed to a 4 week adjournment of the July 10, 2019 scheduled hearing date. This will provide time to resolve this Motion. Attached

3. *is adjournment request filed today.*
This certification is being made in an effort to resolve the issues raised in the certification of default or motion.

4. I certify under penalty of perjury that the above is true.

Date: July 3, 2019

Date: _____


/s/Robert Wachtel

Debtor's Signature

Counsel's
Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.

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In Re:

HENRY CASANOVA

Case No.: 18-22020SLM

Adv. Pro. No.: _____

Chapter: 13

Hearing Date: July 10, 2019

Judge: Meisel

ADJOURNMENT REQUEST

1. I, Robert Wachtel,

☒ am the attorney for: Debtor

☐ am self represented,

and request an adjournment of the following hearing for the reason set forth below,

Matter: Motion for Relief filed by Trinity Financial Services, LLC

Current hearing date and time: July 10, 2019 at 10:00

New date requested: August 14, 2019

Reason for adjournment request: To provide time to negotiate a loan modification

previously offered at terms not acceptable at that time by debtor

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: 7/3/19

/s/Robert Wachtel
Signature

COURT USE ONLY:

The request for adjournment is:

☐ Granted

New hearing date: _____

☐ Peremptory

☐ Granted over objection(s)

New hearing date: _____

☐ Peremptory

☐ Denied

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.

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